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Ecology Review of Draft Work Plan for RI at Greenacres Landfill (GAI, January 1987)

— conversation w/ L. Thompson on 2/18/87

Page	Comments
✓i	- Expand the Table of Contents, specifically 2. TASK DESCRIPTION
✓1	- Change "proposed for" to "underway in."
✓2	- Delete everything from "Results from October..." to "...Silvex at 0.49 ug/l in MW2," including the table. Simply state that VOCs, metals, and pesticides were found down-gradient from the landfill. - Be aware that April results for MW1 and MW2 were switched.
✓3	- Reverse the order of project objectives (3) and (4).
✓7	- Substantially reduce the management time for Envirosphere during the RI, ~~but increase~~
~~✓10~~	~~- Explain the involvement of Envirosphere and Hall in project meetings.~~
✓11	- ~~Discuss the potential need for~~ Generate a separate Sampling Plan. (how many, why, where, logistics)
✓12	- Considering that the Data Base Management Plan has already been developed and is in use at other sites, why should Ecology have to pay for developing it again? Some modification is needed. Cost will be adjusted downward.
~~14~~	~~- Delete two of the fact sheets.~~
✓15	- Change the community meeting to a PRP briefing. ~~- Delete two of the updates.~~ ~~- Delete press relations responsibilities.~~
✓18	- What lab will be used? Is it possible to find one in this state? Will bid out contracts. Must follow the QAP.
✓21	- Data on landfill operation and history have already been compiled. - Landsat photos are not required.
✓24	- List all contaminants known to date which are toxic. Screen these a a first phase, taking into account the level of toxicity and known concentrations. Then proceed with the risk assessment on only the significant contaminants of concern. - Define tetrachloroethene as PCE to maintain consistency with previous reports.
✓25	- Ca and Mg are not toxic. - Releases of Ba, As, Se, Ag, Tl, and Sb have not been documented. - If no regulatory standards are available, use risk assessment procedures for noncarcinogens as well. - ~~State all risk assessment~~ assumptions a priori to avoid future allegations of data massaging. Allow Ecology to review these assumptions before preceeding with the assessment. - Consider additive effects based upon toxicological endpoints.
✓26	- Be sure to evaluate uses of property before limiting pathway exposures. - State that a detailed risk assessment will be performed as an initial task in the FS.

Page	Comments
~~28~~	~~- Plan sheets need to include a survey grid based on one or more field monuments for reference.~~ Ask Megan. Survey grid is certified. Show NSEW grid on final map (like longs + lats)
✓30	- Confine the inventory to Seq. 10 and revise the number of samples accordingly. — all Fig 2 as agreed - 2 phase inventory and samples
✓31	- Confine chemical analyses to ~~VOCs~~ contaminants of concern. ~~- Field screening with a GC is not necessary.~~ ~~- Reduce QA rate to 5%.~~ - 15 to 30 minute purges are not necessarily three well volumes. - find an up-gradient control
✓32	- Protective clothing is not necessary. - There is no need to treat purged water. - Differing prices for the field GC appear throughout this document. Field OVA vs. laboratory GC (portable)
~~33~~	~~- Explain the need for Petrex tubes.~~
✓35	- Eliminate the GPR survey. - We will not use geophysics to define the plume.
(37) Call Norteo	- The EM survey should be confined to the perimeter only.
✓39	- Only contaminated private wells will be logged geophysically, along w/ others that may be strategically located.
✓40	- Why are costs for control work not addressed? - Delete assumption #4.
✓42	- ~~Combine~~ Make activities 13A, ~~14A, and 14B into~~ a separate field preparation task.
(43)	✓- Discuss the need to utilize shallow excavations to back up the EM survey. ✓- Do not install gas probes in excavations. ~~- Decontamination of drilling equipment is not needed within the landfill.~~ ask Neil! Needed only b/w [illegible] - Split-tube sampling and detailed waste chemistry is not needed. - Extend these borings ~~into~~ to the bedrock at the interface to determine ~~degree of fracturing,~~ ~~quality of leachate~~ state, and quantity of leachate. (needed not [illegible] for FS) - Multiple level gas probes are not needed. Complete these wells so that the entire interval is screened and use them for combination leachate and gas wells. ✓- Potential gas migration from the site must be evaluated. Evaluate the possibility of installing a valve on the dry well in MW1 to convert it to a gas probe. Gas migration potential must also be evaluated to the NW and SE of the site (in the direction of nearby residences).
~~Fig 5~~	~~- Explain the rationale behind the locations of the well clusters. Would it be possible to find a private well to be used for background in place of cluster #4?~~
(44)	~~- Fencing costs seem high.~~ - There is no need to capture cuttings. ask Neil — dispose of cuttings in a plastic lined pit on site for on site drilling so that they could be removed
✓46	- Phase 2 wells "may" be installed.
✓47	- The total number of wells referred to is inconsistent throughout the document.

Page	Comments
~~48~~	~~- Why use diamond drilling rig with a wireline?~~
49	- Justify the dedication of pumps: 1) to prevent cross contamination; 2) wells will be used for several rounds of sampling during the RI and for long term monitoring afterwards; 3) due to the large volume of water in certain wells, substantial labor savings will be realized; 4) Ecology will recycle pumps after they are no longer needed at this site; and 5) low producing wells, such as MW3 will not receive a dedicated pump.
	- What kind of pump will be used? Hydrostar Will it be compatible with a 2 inch well? yes Also, JW does not require a pump.
Fig 6	- Would triple completion wells be adequate? Use double + single. (Deep as single.) WP will be finalized w/ single completions.
	- Well centralizers do not need to be stainless steel above the water table.
	- Do not use PVC within the landfill; use steel/stainless steel combination.
50	- Place a ~~three foot bentonite pellet seal~~ fine sand pack above the coarse sand pack.
	- Drilling costs are inconsistent with those in Table 3-2.
	- Are the working days required for well installation per well?
53	- All monitoring wells will be sampled for priority pollutants during the first round (EPA policy). In addition sample for the following parameters: T, SC, pH, Cl, COD. After the first round of data is analyzed we will concentrate on contaminants of concern and obvious indicator parameters. d. metals will be analyzed. add std. inorganics for treatment evaluation.
	~~- Discuss possible benefits to replicating known target parameters.~~
54	- Make sure that all water level measurements are obtained on the same day for each specific round. How many rounds will be performed?
55	- It will not be necessary to capture decontamination solutions.
Fig 7	- Provide an additional month for review of the RI final report.